

FILED

MAR 12 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DWIGHT LESUEUR,

Defendant.

No.

4:20CR00183 ERW/NCC

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about May 28, 2019, in St. Charles County, within the Eastern District of Missouri,
the defendant,

DWIGHT LESUEUR,

in connection with the acquisition of a Del-Ton Inc., DTI-15 pistol, bearing serial number DTI - S185550, from Kevin's Guns, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written and oral statement to Kevin's Guns, which statement was intended and likely to deceive Kevin's Guns, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was not an unlawful user of a controlled substance on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Form 4473 Firearms Transaction Record, which representation was false, in violation of Title 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT TWO

The Grand Jury further charges that:

On or about May 28, 2019, in St. Charles County, within the Eastern District of Missouri, the defendant,

DWIGHT LESUEUR,

in connection with the acquisition of a Del-Ton Inc., DTI-15 pistol, bearing serial number DTI-S185550, from Kevin's Guns, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written and oral statement to Kevin's Guns, which statement was intended and likely to deceive Kevin's Guns, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Form 4473 Firearms Transaction Record, to the effect that the defendant represented himself as the actual buyer of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person, in violation of Title 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT THREE

The Grand Jury further charges that:

On or about June 2, 2019, in Lincoln County, Missouri, within the Eastern District of Missouri, the defendant,

DWIGHT LESUEUR,

in connection with the acquisition of a Glock 19X, 9mm, semi-automatic pistol, bearing serial number BKEM491, from Jub Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written and oral statement to Jub Arms, which statement was intended and likely to deceive Jub Arms Guns, as to a fact

material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was not an unlawful user of a controlled substance on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Form 4473 Firearms Transaction Record, which representation was false, in violation of Title 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT FOUR

The Grand Jury further charges that:

On or about June 2, 2019, in Lincoln County, Missouri, within the Eastern District of Missouri, the defendant,

DWIGHT LESUEUR,

in connection with the acquisition of a Glock 19X, 9mm, semi-automatic pistol, bearing serial number BKEM491, from Jub Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written and oral statement to Jub Arms, which statement was intended and likely to deceive Jub Arms Guns, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Form 4473 Firearms Transaction Record, to the effect that the defendant represented himself as the actual buyer of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person, in violation of Title 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT FIVE

The Grand Jury further charges that:

On or about June 4, 2019, in St. Charles County, within the Eastern District of Missouri, the defendant,

DWIGHT LESUEUR,

in connection with the acquisition of a Diamond Back DB-15, 5.56 caliber pistol, bearing serial number DB1581378, from Kevin's Guns, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written and oral statement to Kevin's Guns, which statement was intended and likely to deceive Kevin's Guns, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was not an unlawful user of a controlled substance on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Form 4473 Firearms Transaction Record, which representation was false, in violation of Title 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT SIX

The Grand Jury further charges that:

On or about June 4, 2019, in St. Charles County, within the Eastern District of Missouri, the defendant,

DWIGHT LESUEUR,

in connection with the acquisition of a Diamond Back DB-15, 5.56 caliber pistol, bearing serial number DB1581378, from Kevin's Guns, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written and oral statement to Kevin's Guns, which statement was intended and likely to deceive Kevin's Guns, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Form 4473 Firearms Transaction Record, to the effect that the defendant represented himself as the actual buyer of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person, in violation of Title 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT SEVEN

The Grand Jury further charges that:

Between in or about May 28, 2019 to in or about June 4, 2019, in St. Charles, Missouri and Lincoln County, Missouri, within the Eastern District of Missouri,

DWIGHT LESUEUR,

the Defendant herein, knowing he is an unlawful user of or addicted to any controlled substance, did knowingly possess one or more firearms, which previously traveled in interstate or foreign commerce during or prior to being in the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(3).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

ANTHONY FRANKS #50217MO
Assistant United States Attorney